

EDWARD H. KUBO, JR. 2499
United States Attorney
District of Hawaii

THOMAS A. HELPER 5676
Room 6-100, PJKK Federal Bldg.
Assistant U.S. Attorney
300 Ala Moana Boulevard
Honolulu, Hawaii 96850
Telephone: (808) 541-2850
Facsimile: (808) 541-3752
E-mail: tom.helper@usdoj.gov

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

RAYMOND WARE,)	CIVIL NO. 04-00671 HG LEK
)	
Plaintiff,)	DEFENDANT'S WITNESS LIST;
)	CERTIFICATE OF SERVICE
v.)	
)	
MICHAEL CHERTOFF, Secretary,)	
DEPARTMENT OF HOMELAND)	
SECURITY,)	Trial: February 5, 2008
Defendant.)	Judge: Hon. Helen Gillmor
)	
_____)	

DEFENDANT'S WITNESS LIST

Comes now defendant, Secretary of Department of Homeland Security, by and through its attorneys, Edward H. Kubo, United States Attorney, and Thomas A. Helper, Assistant United States Attorney, and hereby identifies the following witnesses who may testify at trial of this matter. Unless otherwise noted, all witnesses are employees of the Transportation Security Administration at Honolulu International Airport (HNL), who should be contacted through undersigned counsel only.

1. Kenneth Kamahale, Assistant Federal Safety Director, will testify about his recommendation to promote applicants other than plaintiff for promotion to screening manager in August 2003. Estimated time on direct examination: 2 hours.
2. Sidney Hayakawa, former Federal Safety Director, will testify about his decision to promote applicants other than plaintiff for promotion to screening manager in August 2003. Estimated time on direct examination: 1 hour.
3. Robin-Ann K. Wong, Screening Manager, will testify about her supervision of plaintiff. Estimated time on direct examination: 1 hour.
4. Lizette Haneberg, Screening Manager, will testify about her supervision of plaintiff. Estimated time on direct examination: 1 hour.
5. Leo Ventura, Screening Manager, will testify about his supervision of plaintiff, and about his own qualifications for promotion in August 2003. Estimated time on direct examination: 1 hour.
6. Jose Abrante, Screening Manager, will testify about his supervision of plaintiff, and about his own qualifications for promotion in August 2003. Estimated time on direct examination: 1 hour.

7. Johnelle Chun, AKAL Security, 834-6051, will testify about her interactions with plaintiff in the course of the discovery of an abandoned bag at HNL on June 12, 2003. Estimated time on direct examination: ½ hour.
8. Charles DuBoyce, former Screening Manager, will testify about his supervision of plaintiff, and about his own qualifications for promotion in August 2003. Estimated time on direct examination: 1 hour.
9. Any witness named by plaintiff.
10. Any witness necessary for rebuttal.

DATED: January 15, 2008, at Honolulu, Hawaii.

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

By /s/ Thomas A. Helper
THOMAS A. HELPER
Assistant U.S. Attorney

Attorneys for Defendant

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RAYMOND WARE,)	CIVIL NO. 04-00671 HG LEK
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Plaintiff,)	CERTIFICATE OF SERVICE
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v.)	
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MICHAEL CHERTOFF, Secretary,)	
DEPARTMENT OF HOMELAND)	
SECURITY,)	
Defendant.)	
)	
_____)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on the date and by the method of service noted below, a true and correct copy of the foregoing was served on the following at their last known address:

Served Electronically through CM/ECF:

Daphne E. Barbee
desekmet@aloha.net

January 15, 2008

DATED: January 15, 2008, at Honolulu, Hawaii.

/s/ Coleen Tasaka-Shoda
